

SW/JDP: USAO# 2013R00774

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MICHAEL WESLEY LEE,  
a/k/a "King P," and  
ROBERT DOWNING,  
a/k/a "Luck," a/k/a "Shamrock,"  
  
Defendants.

CRIMINAL NO. JFM-13-0678

(Use of Interstate Facility to Promote  
and Facilitate Prostitution Business,  
18 U.S.C. § 1952(a); Sex Trafficking  
Conspiracy, 18 U.S.C. § 1594; Interstate  
Transportation for Prostitution, 18  
U.S.C. § 2421(a); Sex Trafficking by  
Force, Fraud, or Coercion, 18 U.S.C.  
§ 1591; Coercion and Enticement, 18  
U.S.C. § 2422(a); Aiding & Abetting, 18  
U.S.C. § 2; Forfeiture Allegation, 18  
U.S.C. § 1594(d)&(e))

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SUPERSEDING INDICTMENT

COUNT ONE

(Use of Interstate Facility to Promote and Facilitate Prostitution Business)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendant **MICHAEL WESLEY LEE, a/k/a "King P,"** was born in 1984 and lived in various locations to include New York City, New York and Odenton, Maryland.
2. Defendant **ROBERT DOWNING, a/k/a "Luck," a/k/a "Shamrock,"** was born in 1969 and lived in Odenton, Maryland.
3. **LEE** was a pimp who used social media websites such as "Tagged" and "Backpage" to persuade and entice females to engage in commercial sex acts for his personal financial benefit. **LEE** used coercion, force, and threats of force to maintain control over the

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females. **LEE** and **DOWNING** used postings and advertisements in Backpage to facilitate commercial sex services on Backpage, and **LEE** used Tagged to communicate regarding his prostitution business.

4. Both **LEE** and **DOWNING** rented or arranged the rental of hotel rooms to house the females and to serve as a place in which the prostitution business could operate.

5. Both **LEE** and **DOWNING** used prepaid gift and debit cards like Green Dot cards, RushCards, and Vanilla Visa Gift Cards in their prostitution business, buying (or causing others to buy) such cards with cash from the sexual transactions of their prostitution business and using those cards to pay for their advertisements for commercial sex services on websites like Backpage.

6. Both **LEE** and **DOWNING** used and attempted to use cellular telephones to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on, of their prostitution business, including: (a) persuading, inducing, and enticing, and facilitating individuals to travel in interstate commerce to engage in prostitution or in sexual activity for which any person can be charged with a criminal offense; (b) to take and receive photographs for use in advertisements for commercial sex services; (c) to compose, post, and buy advertisements for commercial sex services; and (d) to communicate regarding their prostitution businesses, with each other, with clients, and with the females they were prostituting.

7. In or about February 2013, **LEE** transported a female (hereinafter referred to by the initial "J") to travel from New York to Maryland with the intent that "J" engage in prostitution.

8. In or about August 2013, **LEE** persuaded, induced, and enticed a female (hereinafter referred to by the initial "S") to travel from Missouri to Maryland for the purpose of

engaging in prostitution. On or about August 9, 2013, LEE arranged for the transportation of "S" from Missouri to Maryland with the intent that "S" engage in prostitution.

9. On or about August 19, 2013, LEE transported "S" from Maryland to New Jersey for the purpose of engaging in prostitution.

10. In or about August 2013, LEE persuaded, induced, and enticed a female (hereinafter referred to by the initial "M") to a hotel in Maryland for the purpose of engaging in prostitution.

**The Charge**

11. Beginning as early as 2012 and continuing through on or about August 26, 2013, in the District of Maryland, the Eastern District of Missouri, the Southern and Eastern Districts of New York, the District of New Jersey, and elsewhere, the defendants,

**MICHAEL WESLEY LEE,  
a/k/a "King P,"  
and  
ROBERT DOWNING,  
a/k/a "Luck," a/k/a "Shamrock,"**

traveled in interstate and foreign commerce and used a facility in interstate and foreign commerce, namely the Internet, cellular telephones, hotels and prepaid debit and gift cards, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving prostitution in violation of the laws of the State of Maryland, to include MD Code, Criminal Law, §§ 11-303, 11-304, and of the United States, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

18 U.S.C. § 1952(a)  
18 U.S.C. § 2

**COUNT TWO**

(Conspiracy to Commit Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury for the District of Maryland further charges that:

1. The allegations contained in Paragraphs 1 through 10 of Count One are incorporated by reference here.
2. Beginning in or about February 2013 and continuing through August 2013, in the District of Maryland and elsewhere, the defendants,

**MICHAEL WESLEY LEE,**  
**a/k/a "King P,"**  
**and**  
**ROBERT DOWNING,**  
**a/k/a "Luck," a/k/a "Shamrock,"**

did knowingly and intentionally combine, conspire, confederate and agree together with each other and others known and unknown to the Grand Jury to violate Title 18, United States Code, Section 1591(a); to wit: knowingly, and in or affecting interstate commerce, recruiting, enticing, harboring, transporting, providing, obtaining, or maintaining by any means a person; or knowingly benefitting, financially or by receiving anything of value, from participation in a venture which has engaged in such an act, as to either, while knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the person to engage in a commercial sex act.

**MANNER AND MEANS OF THE CONSPIRACY**

3. It was part of this conspiracy that **LEE** and **DOWNING** discussed and facilitated the promotion, management, establishment and carrying on of the prostitution of "J."
4. It was further part of this conspiracy that, after **LEE** was detained for assaulting "J," **DOWNING** transported "J" away from the scene of the assault and to a hotel for the purpose of having her engage in prostitution.

5. It was further part of this conspiracy that **DOWNING** promote, manage, establish, and carry on – and facilitate the same – the prostitution of “J.”

6. It was further a part of the conspiracy that **LEE** and **DOWNING** agreed that the proceeds, or a portion thereof, of the prostitution of “J” would be used to secure **LEE**’s release from detention.

7. It was further part of this conspiracy that **LEE** directed **DOWNING** never to leave “J” alone in a room in order to prevent her escape.

8. It was further a part of the conspiracy that both **LEE** and **DOWNING** were knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means had been and would continue to be used to cause “J” to engage in a commercial sex act.

18 U.S.C. § 1594

**COUNT THREE**

(Interstate Transportation for Prostitution)

The Grand Jury for the District of Maryland further charges that:

1. The allegations contained in Paragraphs 1 through 10 of Count One and in Paragraphs 3 through 8 of Count Two are incorporated by reference here.
2. In or about February 2013, in the District of Maryland, the Eastern District of New York and elsewhere, the defendant,

**MICHAEL WESLEY LEE,**  
**a/k/a "King P,"**

did knowingly and intentionally transport, and aid and abet the transportation of an individual, that is, "J", in interstate commerce with the intent that such individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2421(a)

18 U.S.C. § 2

**COUNT FOUR**

(Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury for the District of Maryland further charges that:

3. The allegations set forth in Paragraphs 1 through 10 of Count One and in Paragraphs 3 through 8 of Count Two are incorporated by reference here.

4. In or about February 2013, in the District of Maryland, the Eastern District of New York, and elsewhere, the defendant,

**MICHAEL WESLEY LEE,**  
***a/k/a "King P,"***

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, "J", and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause "J" to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

**COUNT FIVE**  
(Coercion and Enticement)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 10 of Count One are incorporated by reference here.
2. In or about August 2013, in the District of Maryland, the Eastern District of Missouri, and elsewhere, the defendant,

**MICHAEL WESLEY LEE,**  
***a/k/a "King P,"***

did knowingly persuade, induce, entice, and coerce an individual, that is, "S", to travel in interstate commerce to engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2422(a)

18 U.S.C. § 2



**COUNT SIX**

(Interstate Transportation for Prostitution)

The Grand Jury for the District of Maryland further charges that:

3. The allegations contained in Paragraphs 1 through 10 of Count One are incorporated by reference here.

4. On or about August 10, 2013, in the District of Maryland, the Eastern District of Missouri and elsewhere, the defendant,

**MICHAEL WESLEY LEE,**  
**a/k/a "King P,"**

did knowingly and intentionally transport, and aid and abet the transportation of an individual, that is, "S", in interstate commerce with the intent that such individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2421(a)

18 U.S.C. § 2

**COUNT SEVEN**

(Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 10 of Count One are incorporated by reference here.
2. In or about August 2013, in the District of Maryland, the Eastern District of New York, and elsewhere, the defendant,

**MICHAEL WESLEY LEE,  
a/k/a "King P,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, "M", and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause "M" to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

**FORFEITURE ALLEGATION**

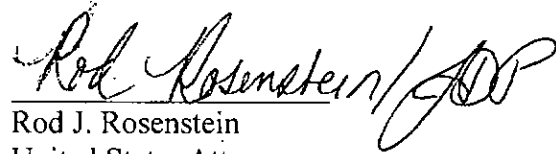
The Grand Jury for the District of Maryland further charges that:

Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to defendants,

**MICHAEL WESLEY LEE,**  
**a/k/a "King P," and**  
**ROBERT DOWNING,**  
**a/k/a "Luck," a/k/a "Shamrock,"**

that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Sections 1594(d) and (e) in the event of the defendants' convictions on Counts Two, Four and Seven of this Superseding Indictment to include any and all property, real or personal, used and intended to be used to commit and facilitate said violations and any property, real and personal, which constitutes and is derived from proceeds traceable to said violations.

18 U.S.C. § 1594  
18 U.S.C. § 981

  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

FOREPERSON

3/5/2014  
Date